

Subject: RE: Notice of Immediate Termination for Cause
Date: Thursday, January 23, 2025 at 6:09:49 PM Eastern Standard Time
From: Tanvir Rahman <TRahman@filippatoslaw.com>
To: Gerry Filippatos <pgf@filippatoslaw.com>, Zoya Kovalenko <zoyavk@outlook.com>
Attachments: [REDACTED]

Zoya – Gerry asked me to send you our latest [REDACTED] You'll see how we incorporated a fair number of you [REDACTED] Let us know if you'd like to discuss. Thanks.

Warmly,



Tanvir Rahman

Managing Partner

Pronouns: He/Him



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From: Gerry Filippatos <pgf@filippatoslaw.com>
Sent: Thursday, January 23, 2025 5:47 PM
To: Zoya Kovalenko <zoyavk@outlook.com>; Tanvir Rahman <TRahman@filippatoslaw.com>
Subject: RE: Notice of Immediate Termination for Cause

Zoya,

You have no basis to terminate our firm for cause – you do, however, have the right to fire us as your attorneys at any time. Indeed, if -- as you attempted to do again today, and have done consistently over the past few weeks -- you continue to insist on ignoring our advice [REDACTED]

Accordingly, we will assert all appropriate liens against you and so notify opposing counsel and the court. [REDACTED]

If you wish to reconsider after you have read our comments, you can contact us this evening to further discuss [REDACTED]

It could not be farther from the truth that the conflict between us stems from us [REDACTED]

[REDACTED] not only have we done an inordinate amount of work on your case and endured stubborn and useless diatribes by you on all too many occasions, you have never grasped the fundamental truth that while you may be a licensed attorney in other jurisdictions, in this case, you are a client and cannot dictate to us (as your attorneys) how we do our job and meet our professional responsibilities. [REDACTED]

[REDACTED] -- is the product of our persistent and zealous representation of you against your former employer and your own self-destructive tendencies.

In summary, in case you change your mind, we will await until tomorrow before notifying counsel and the Court of our departure from your matter and the assertion of our liens against your claims and files. Within those confines, we will of course cooperate with any successor counsel you may retain. Finally, please be advised that as you have falsely and baselessly fired us for alleged cause, [REDACTED]